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July 13, 2022

VIA ECF

Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: **Response to Plaintiff's July 13, 2022 First Motion for Extension of Time to File Motion to Transfer Venue and Stay Defendant's Motion to Dismiss**
Katerina Georgiou v. Harmon Stores, Inc.
2:22-cv-02861-BMC

Dear Judge Cogan:

Defendant Harmon Stores, Inc. ("Harmon") submits this response to Plaintiff Katerina Georgiou's First Motion for Extension of Time to File Motion to Transfer Venue and Stay Defendant's Motion to Dismiss. Harmon does not oppose Georgiou's request, but it writes to correct Georgiou's misstatement that it does not consent to this request. As the chronology below shows, Georgiou's counsel did not provide Harmon with adequate time to consider his request for an extension and respond:

Date and Time	Event
July 13, 2022, 1:11 p.m.	Harmon filed its motion to dismiss.
July 13, 2022, 1:35 p.m.	Georgiou's counsel emailed Harmon's counsel, stating: "Jeff FYI I'm going to be seeking an extension on my motion until moday..."
July 13, 2022, 2:20 p.m.	Although Georgiou's counsel's "FYI" email did not call for a response, Georgiou's counsel emailed Harmon's counsel, stating: "Will you consent?"
July 13, 2022, 2:38 p.m.	After waiting 18 minutes for a response, Georgiou's counsel filed his request for an extension in which he represented: "Defendant does not consent to this request."

Respectfully Submitted,

/s/ Jeffrey H. Ruzal
Jeffrey H. Ruzal

cc: all counsel of record (via ECF)